THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

BAKER HUGHES OILFIELD OPERATIONS, INC.

Plaintiff and counterclaim defendant,

Civil Action No. 4:16-cy-01521

v.

BUBBLETIGHT, LLC

Defendant and counterclaim plaintiff.

COUNTERCLAIM DEFENDANT BAKER HUGHES'S ANSWER TO DEFENDANT'S COUNTERCLAIMS

Plaintiff and counterclaim defendant Baker Hughes Oilfield Operations, Inc. ("Baker Hughes") answers the counterclaims alleged by defendant Bubbletight, LLC ("Bubbletight") in its answer to Baker Hughes's original complaint (Doc. 9) and states as follows in response to each numbered paragraph of the counterclaims:

NATURE OF THE ACTION

- 1. Baker Hughes admits that the action purports to seek declaratory judgment of invalidity and non-infringement of the asserted patents. Baker Hughes denies that the action has merit.
 - 2. Admitted.

THE PARTIES

- 3. Admitted.
- 4. Admitted.

JURISDICTION AND VENUE

- 5. Admitted.
- 6. Admitted.

FIRST COUNTERCLAIM

- 7. Admitted.
- 8. Denied.

SECOND COUNTERCLAIM

- 9. Admitted.
- 10. Denied.

PRAYER FOR RELIEF

Baker Hughes accordingly asks the Court to enter judgment that Bubbletight take nothing on its counterclaims, dismiss Bubbletight's counterclaims with prejudice, assess costs against Bubbletight, and award Baker Hughes all other relief that the Court deems appropriate.

Date: September 22, 2016 Respectfully submitted,

/s/ Charles B. Walker Jr.
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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on September 22, 2016 via the CM/ECF system that automatically serves a notice of electronic filing of this document to all those registered as filing users for the system, which include the following:

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